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April 21, 2022

**BY ECF**

Hon. Vera M. Scanlon  
United States Magistrate Judge  
Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Susser v. New York City Department of Education, et al.*, 22-cv-51 (AMD)  
(VMS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel recently assigned to represent Defendants New York City Department of Education (DOE) and the Curtis High School Adult Practical Nursing Program (the “Nursing Program”) in the above-captioned matter, in which Plaintiff alleges she was dismissed from the Nursing Program without due process and in breach of her alleged contract with the DOE. I write, with Plaintiff’s consent, to respectfully request an approximately 60-day extension of time for Defendants to respond to the Complaint, from April 25, 2022 to June 24, 2022. Defendants additionally respectfully request, with Plaintiff’s consent, that the Initial Conference currently scheduled for May 10, 2022 be adjourned to a date subsequent to Defendants’ deadline to respond to the Complaint.

Plaintiff commenced this action on January 4, 2022 (Dkt. No. 1), and served the Complaint on Defendant Nursing Program on April 4, 2022 and Defendant DOE on April 5, 2022.<sup>1</sup> The requested extension and adjournment would allow my office time to review the Complaint and investigate Plaintiff’s allegations in order to develop an appropriate response.

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<sup>1</sup> Defendant DOE was not served with a Summons attached to the Complaint. However, DOE agrees to waive service in light of Plaintiff’s consent to the requested extension. My office is investigating whether the Nursing Program was validly served the Summons and Complaint, but will waive service on its behalf as well should service have been improper.

This is my office's first request for an extension of time to respond to the Complaint and adjournment of the Initial Conference, and if granted, the requests would not affect any other deadlines.

Accordingly, Defendants respectfully request a 60-day extension of time to respond to the Complaint, until June 24, 2022, and a corresponding adjournment of the Initial Conference until a date subsequent to Defendants' deadline to respond to the Complaint.

Thank you for your consideration of these requests.

Respectfully submitted,

/s/

Hannah J. Sarokin  
Assistant Corporation Counsel

cc. Keith Altman, Esq. (by ECF)  
Plaintiff's counsel